

PRIME TANNING COMPANY)	DEPARTMENTAL
YORK COUNTY)	FINDINGS OF FACT AND ORDER
BERWICK, MAINE)	AIR EMISSION LICENSE
A-376-70-B-M)	AMENDMENT #1

After review of the Part 70 License minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Prime Tanning Company (Prime)
LICENSE NUMBER	A-376-70-A-I
LICENSE TYPE	Part 70 License Minor Revision
SIC CODES	3111-Leather Tanneries
NATURE OF BUSINESS	Leather Tanning and Finishing
FACILITY LOCATION	Sullivan Street, Berwick
DATE OF INITIAL LICENSE ISSUANCE	April 26, 2000
DATE OF MINOR REVISION ISSUANCE	April 18, 2001
LICENSE EXPIRATION DATE	April 26, 2005

B. Application Classification

The application is for the installation of new roll coating units to replace existing spray bar operations. The modification will not result in a change of Prime's existing air license emission limits. The application does not involve a relaxation or change in monitoring, testing, reporting or recordkeeping requirements. Actual VOC and HAP emissions are anticipated to be reduced due to the higher transfer efficiency of the new roll coating over the replaced spray bar operations. However, the roll coaters represent new equipment at a major source and requires a BACT analysis.

Therefore, this application is being processed as a minor modification of a Part 70 source, under the requirements of Section 5 (B) of Chapter 140 of the Department's regulations for a Part 70 source and under Section 5 of Chapter 115 for major and minor sources.

II. AMENDMENT DESCRIPTION

New Equipment Description

The application for Prime Tanning involves a modification to one of the process lines of their leather finishing operation. Prime's intention is to replace one of the dual spray lines with two roll coating machines. This line is currently run with two spray booths followed by dryers, which Prime proposes to convert to two roll coaters with dryers. The newer roll coaters can run in forward or reverse mode which makes them more flexible and they also are "direct application" meaning that roll coating achieves 100% transfer efficiency.

Typical spray booth transfer efficiencies run from 30% to 60% so on the average nearly twice as much finish is required in a spray booth versus a direct application piece of equipment like a roll coater. Therefore, VOC and HAP emissions from this new roll coating line would result in an overall reduction based on a lb/1000 ft². In addition there is no overspray so there is no need for PM control like there is on a spray booth. The new roll coating machines will not be vented to the outside while the spray booths exhaust over 10,000 cfm each.

BACT Analysis

The BACT analysis includes evaluating any new technologies available for new roll coating in the leather industry. It was found that very few new technologies exist for reducing emissions from roll coaters. One significant improvement in roller coat technology is the use of heated finish material containers and heated application rolls. This allows, in some products, the use of heat to get certain finish materials into the leather rather than using solvents. The new roll coater, Prime plans to install, can run both in the forward mode (synchro) and reverse modes, which increases the range of application rates available. The newer models also have the option of a spreading device, which reduces the potential for the softer leathers to fold over while feeding into the machine. Roll-coating technology is generally viewed as a control technology alternative to spray operations. Therefore, to meet the requirements of BACT, Prime shall install roll coaters which have the above capabilities.

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Additional Revisions

This amendment also replaces Standard Condition (19) with the revised Condition (19) in Chapter 140 of the Department's regulations. Standard Condition (19) was revised to clarify that 40 CFR Part 70 only requires a summary of periodic monitoring and deviations on a semiannual basis, as opposed to a quarterly basis.

In addition, this amendment also clarifies the intent of Special Condition (37) in air emission license A-376-70-A-I. The existing license condition states that all documents submitted to the Bureau of Air Quality must be signed by a responsible official. The condition has been replaced to clarify that only reports are required to be signed by a responsible official, as required by 40 CFR Part 70. The Bureau of Air Quality did not intend to require all letters and correspondence to be signed by a responsible official.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License minor revision A-376-70-B-M, subject to the following conditions:

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: *Enforceable by State-only*.

STANDARD CONDITIONS

The following condition replaces Condition (19) in Air Emission License A-376-70-A-I:

- (19) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

SPECIAL CONDITIONS

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The following condition replaces Condition (37) in air emission license A-376-70-A-I:

(37) Certification by a Responsible Official

All reports (including notice of license deviations, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

The following conditions are in addition to the existing conditions of Air Emission License A-376-70-A-I.

- (1) Prime can convert one of the existing “Dual Spray Lines” from two spray booths with dryers, to two roll coaters with dryers. The new roll coating units will be installed with the capability to use heated finish material containers and heated application rolls. The roll coaters can also run in the forward mode (synchro) and reverse modes. This line with the new roll coaters can not exceed a VOC emission limit of 39.9 tons per year. Prime shall keep chemical usage records to demonstrate compliance with this limit.
- (2) This amendment shall expire concurrently with air emission license A-376-70-A-I.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2001.
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: December 22, 2000

Date of application acceptance: January 11, 2001

Date filed with the Board of Environmental Protection _____

This Order prepared by Edwin Cousins, Bureau of Air Quality.